

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Dear Chairwoman Rosenworcel:

The below signed organizations respectfully request that you schedule an auction of the 2.5 GHz spectrum that will remain after the Commission processes the applications that were submitted during the Tribal Window that closed more than a year ago. We understand that Commission staff is working tirelessly to complete the review of the remaining Tribal applications. It is important that the Commission devote the resources needed to complete that process. But it is also important that the Commission establish a date now to begin the 2.5 GHz spectrum auction.

The Commission need not wait to complete the processing of the Tribal applications to schedule the auction. Establishing the auction procedures and setting a date for the auction to begin will allow potential applicants to start planning and will expedite the provision of service using the 2.5 GHz spectrum. Many of the licenses that will be auctioned are adjacent to the areas for which Tribes will be licensed, meaning that carriers will be able to provide coverage adjacent to areas where Tribes will provide service – expanding the coverage from those Tribal areas in the same spectrum band. The Commission can process Tribal applications in parallel with initiating pre-auction processes. It has taken a similar approach in other cases where the spectrum that may be available for auction is not finalized.

As the Commission knows well, spectrum is the lifeblood of wireless networks. In the last several years, the Commission has auctioned thousands of megahertz of spectrum across low, mid, and high-band frequencies, but more is needed. Therefore, the Commission must auction the more than 8,000 licenses in the 2.5 GHz band that will remain after the important Tribal Window process has concluded. The 2.5 GHz spectrum will be a critical resource for carriers as they seek to expand the reach, deepen the capacity, and increase speeds of 5G networks, especially to unserved and underserved communities.

The last year and a half of living in the COVID-19 era has highlighted for us all the urgent need for access to reliable, high-speed broadband service as Americans across the country have used the internet to go to school, access critical healthcare, work, and communicate with family and friends. We have all seen rural communities across the country huddled together around school buses, because that's the only way students in those communities could access distance learning materials. We also have observed neighborhoods in America's urban cores that lack the same broadband choices as some of their neighbors. While 2.5 GHz spectrum alone is not the solution, it is perhaps the most valuable tool that the Commission can use to enable carriers to strengthen their networks.

Making the remaining 2.5 GHz band available for mobile and in-home broadband also will promote continued development and availability of the equipment that forms the backbone of wireless networks. Robust demand for 2.5 GHz equipment driven by commercial and Tribal deployments will help ensure the greatest availability of equipment and uniformity of coverage. Auctioning the remaining 2.5 GHz licenses therefore has the added benefit of building upon the success of the Tribal Window by expanding demand and driving a larger equipment ecosystem for the Tribes that are currently making the plans to put those licenses into use and the carriers that will deploy the rest of the 2.5 GHz licenses to unserved or underserved communities. In other words, any unnecessary delay in the FCC auctioning the remaining 2.5 GHz licenses may inhibit innovation and disserve consumers, especially those on the wrong side of the digital divide.

We all hope to soon return to a “normal” way of life, but the future of our society will continue to depend on enhancing robust broadband networks that will support the diverse needs of our great nation. The Commission must do all it can to foster the continued development of wireless networks for all, but especially the unserved and underserved. Therefore, we respectfully request that the Commission advance the public interest by processing the remaining Tribal Window applications and establishing a date now by which the Commission will begin the 2.5 GHz spectrum auction.

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